

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

CRYSTAL KULICK,	)	
	)	
Plaintiff,	)	Case No.
	)	
vs.	)	
	)	
SYNERGETIC COMMUNICATION,	)	
INC., and SECOND ROUND SUB,	)	
LLC,	)	
	)	
Defendant,	)	
_____	)	

**DEFENDANT’S NOTICE OF REMOVAL**

**TO:**

The United States District Court for the Middle District of Pennsylvania	Brett Freeman Freeman Law 606 Hamlin Highway, Suite 2 Lake Ariel, PA 18436
---	---

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. Section 1446(a) and (b), the Defendant Synergetic Communication, Inc., hereby removes this case to the United States District Court for the Middle District of Pennsylvania based on the following grounds:

1. This action is removable to the United States District Court under 28 U.S.C. §§ 1331 and 1441 on the grounds of federal question jurisdiction, in that the complaint purports to allege a cause of action under the Fair Debt Collection Practices Act, 15 U.S.C. §1692, *et seq.*

2. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is filed within thirty days after Defendant's receipt of the initial pleadings setting forth the claim for relief upon which this action is based.
3. Pursuant to 28 U.S.C. § 1446(a), attached hereto as Exhibit "A" are copies of the following documents, which are all the process, pleadings and orders received by one or more Defendants in this action.
4. Upon receipt of this Notice, no further action shall be taken in the Court of Common Pleas of Cumberland County, Pennsylvania.
5. By filing this Notice of Removal, the Defendant demonstrates its consent to the removal of the case to this Court. Furthermore, Defendant represents that it has received the co-Defendant's consent to removal.

Dated: May 3, 2024

Respectfully submitted,

THE LAW OFFICES OF RONALD S.  
CANTER, LLC

/s/ Ronald S. Canter

Ronald S. Canter, Esquire

PA Bar # 94000

200A Monroe Street, Suite 104

Rockville, Maryland 20850-4424

Telephone: (301) 424-7490

Facsimile: (301) 424-7470

E-Mail: [rcanter@roncanterll.com](mailto:rcanter@roncanterll.com)

*Attorney for Defendant Synergetic  
Communication, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and correct copy of the foregoing was mailed to the undersigned counsel on the 3<sup>rd</sup> day of May 2024, to:

Brett Freeman  
Freeman Law  
606 Hamlin Highway, Suite 2  
Lake Ariel, PA 18346  
Attorney for Plaintiff,  
Crystal Kulick

/s/ Ronald S. Canter  
Ronald S. Canter, Esquire  
*Attorney for Defendant Synergetic  
Communication, Inc.*